REMARKS/ARGUMENTS

In this reply, Claims 7 and 20 are canceled. Claims 6, 27, and 29 are amended. Claims 1-6, 8-19, and 21-30 are pending in the application.

To aid in comprehension, the rejections under 35 U.S.C. § 103 will be addressed first, followed by the rejections under 35 U.S.C. § 102.

CLAIM REJECTIONS—35 U.S.C. § 103

Claims 6-11, 13, 19-24, and 26-30 were rejected under 35 U.S.C. § 103 as being unpatentable, allegedly, over U.S. Patent 7,146,399 ("Fox") in view of U.S. Patent Application Publication No. 2004/0064825 ("Lim"). Claims 7 and 20 are canceled. The rejections of Claims 6, 8-11, 13, 19, 21-24, and 26-30 are traversed for at least the reasons discussed below.

Claims 29 and 30

Among other features, Claim 29 as amended recites: "reading data for **different existing XML-schema-dependent instance documents**, wherein the existing XML-schema-dependent instance documents do not contain tags of the existing XML schema;" and "based on said data, generating, **for each particular existing XML-schema-dependent instance document** of the existing XML-schema-dependent instance documents, a corresponding XML-schema-independent instance document that **contains both (a) the tags of the existing XML schema and (b) particular data from said particular existing XML-schema-dependent document**, thereby generating XML-schema-independent instance documents that contain data from the existing XML-schema-independent instance documents and conform to the existing XML schema."

Thus, Claim 29 requires several things, at the least: (1) data from **more than one** existing XML-schema-dependent instance document is read; (2) the existing XML-schema-dependent instance documents from which this data is read are **different** from each other; (3) a corresponding XML-schema-independent instance document (each of which conforms to the existing XML schema) is generated for **each** of these XML-schema-dependent instance documents; and (4) each such XML-schema-independent instance document, so generated, contains the tags of the existing XML schema **and** data from the particular XML-schema-dependent instance document (which does not contain the tags) to which that XML-schema-independent instance document corresponds. As a result, the method of Claim 29 generates a different XML-schema-independent instance document for **each** of the XML-schema-dependent instance documents. These XML-schema-dependent instance documents **do not** contain the tags of the existing XML schema, but the corresponding XML-schema-independent instance documents **do** contain these tags.

Beginning on page 12, the Office Action alleges that these features of Claim 29 are disclosed in Fox, col. 17, lines 44-59, and col. 19, line 46 – col. 20, line 9. Fox, col. 17, lines 44-59, refers to an ontology model that contains classes. However, this ontology model is not an XML instance document at all; the ontology model does not contain instance data. Even if the "classes" of Fox's ontology model are supposed to be analogous to the "tags" of the existing XML schema of Claim 29, Fox's ontology model does not contain any instance data that correspond to those "classes;" for example, although Fox's ontology model indicates a class "City," Fox's ontology model does not, itself, specify any specific **instances** of data for "City" (like "New York" or "Los Angeles," for example). Fox's ontology model might be similar to a schema, but Fox's ontology model is not similar to an instance document that conforms to such a

schema. Additionally, there is no mention of data from **more than one different** XML instance document being read in this section. This section of Fox does not disclose, teach, or suggest "reading data for **different existing XML-schema-dependent instance documents**, wherein the existing XML-schema-dependent instance documents do not contain tags of the existing XML schema."

Admittedly, the text following this portion of Fox does go on to discuss how classes can be mapped to tables in a database. One might theoretically analogize the data in the rows of such tables to the data from the XML-schema-dependent instance documents that are recited in Claim 29. However, even if one made this analogy, Fox still does not disclose, teach, or suggest that the data from the rows of such tables are ever used to generate, for each such row, a separate XML document that contains both the data from that row **and** tags from an existing XML schema. Fox does not generate XML documents based on the data in these rows. Instead, Fox appears to execute a query (shown in col. 18, lines 41-50) that directly inserts the data from a source database table into a target database table. Fox does **not** generate, based on the rows of the source database table, XML documents that contain tags from an existing XML schema. Therefore, Fox does **not** disclose, teach, or suggest "based on said data, generating, **for each particular existing XML-schema-dependent instance document** of the existing XML-schema-dependent instance documents, a corresponding XML-schema-independent instance document that **contains both (a) the tags of the existing XML schema and (b) particular data from said particular existing XML-schema-dependent document**, thereby generating XML-schema-independent instance documents that contain data from the existing XML-schema-independent instance documents and conform to the existing XML schema" as recited in Claim 29.

The Office Action additionally alleges that Fox discloses these features of Claim 29 in col. 19, line 46 – col. 20, line 9. Admittedly, this section of Fox does discuss how XML documents that conform to one XML schema can be transformed, via the application of a derived XSLT script, into XML documents that conform to another XML schema. However, such an XSLT script could only be applied to XML documents that **already contained tags** from the XML schema to which those XML document conformed. Fox's source-XML-schema-conformant XML documents **cannot** be the same as the XML-schema-dependent instance documents of Claim 29, because Claim 29 recites that "the existing XML-schema-dependent instance documents **do not contain tags of the existing XML schema**."

Thus, even if Fox discloses that data from a source database table can be inserted into a target database table that has different columns than the source database table, Fox still fails to disclose generating XML instance documents based on the data in the rows of such a source database table. Additionally, even if Fox discloses that XML documents that conform to a source XML schema can be transformed into XML documents that conform to a target XML schema, Fox still fails to disclose that such XML documents that conform to such a source XML schema are initially generated based on data that does not contain tags from the source XML schema. Fox does not disclose, teach, or suggest that the XML documents that conform to the source XML schema are generated based on the data in the rows of a source database table.

Consequently, Fox does not disclose, teach, or suggest "reading data for **different existing XML-schema-dependent instance documents**, wherein the existing XML-schema-dependent instance documents do not contain tags of the existing XML schema;" and "based on said data, generating, **for each particular existing XML-schema-dependent instance document** of the existing XML-schema-dependent instance documents, a corresponding XML-

schema-independent instance document that **contains both (a) the tags of the existing XML schema and (b) particular data from said particular existing XML-schema-dependent document**, thereby generating XML-schema-independent instance documents that contain data from the existing XML-schema-independent instance documents and conform to the existing XML schema" as recited in Claim 29.

The Office Action does not even allege that Lim discloses these features of Claim 29. Therefore, even if Fox and Lim could be combined, the combination still would not disclose, teach, or suggest the features of Claim 29 discussed above. For at least the above reasons, the Applicants respectfully submit that Claim 29 is patentable over Fox and Lim, considered either individually or in combination, under 35 U.S.C. § 103(a). Claim 30, which depends from Claim 29, is patentable over Fox and Lim under 35 U.S.C. § 103(a) for similar reasons.

Claims 27 and 28

Similarly to (but not exactly the same as) Claim 29, Claim 27 as amended recites: "the procedure reading data for different existing XML-schema-dependent instance documents, wherein the existing XML-schema-dependent instance documents do not contain tags of the existing XML schema;" and "based on said data, the procedure generating, for each particular existing XML-schema-dependent instance document of the existing XML-schema-dependent instance documents, a corresponding XML-schema-independent instance document that contains both (a) the tags of the existing XML schema and (b) particular data from said particular existing XML-schema-dependent document, thereby generating XML-schema-independent instance documents that contain data from the existing XML-schema-independent instance documents and conform to the existing XML schema." For reasons similar to those discussed above in

connection with Claim 29, the Applicants respectfully submit that Claim 27 is patentable over Fox and Lim, considered either individually or in combination, under 35 U.S.C. § 103(a). Claim 28, which depends from Claim 27, is patentable over Fox and Lim under 35 U.S.C. § 103(a) for similar reasons.

Claims 6, 8-11, 13, 19, 21-24, and 26

Claims 6, 8-11, 13, 19, 21-24, and 26 each depend, either directly or indirectly, from Claim 2. By virtue of this dependence, each of Claims 6, 8-11, 13, 19, 21-24, and 26 inherits, from Claim 2, the feature "based on (a) a first XML schema that indicates a first structure of one or more first XML elements, (b) one or more first values that correspond to said one or more first XML elements, and (c) a correlation between said one or more first values and said one or more first XML elements, **generating first data that conforms to said first structure**." The "first structure" to which Claim 2 refers is the structure that is indicated in the "first XML schema." The "first XML schema" of Claim 2 is like a "source XML schema," while the "second XML schema" of Claim 2 is like a "target XML schema." Thus, the recital, in Claim 2, of "generating first data that conforms to said first structure" refers to generating data that conforms to a source XML schema.

As is discussed above, although Fox discusses transforming (a) data that conforms to a source schema into (b) data that conforms to a target schema, Fox assumes that the data that conforms to the source schema already exists. Fox does **not** disclose **generating** the data that conforms to the source schema, let alone generating such data "based on (a) a first XML schema that indicates a first structure of one or more first XML elements, (b) one or more first values that

correspond to said one or more first XML elements, and (c) a correlation between said one or more first values and said one or more first XML elements" as recited in Claim 2.

Although Fox discusses inserting, into a target database table, data from a source database table that has different columns than the target database table does (as is discussed above in connection with Claim 29), Fox does **not** disclose **generating** the data that are in the source database table at all. Although Fox discusses transforming (a) XML documents that conform to a source XML schema into (b) XML documents that conform to a target XML schema (as is discussed above in connection with Claim 29), Fox does **not** disclose **generating** the data that are in the former XML documents at all.

Therefore, Fox does not disclose, teach, or suggest "based on (a) a first XML schema that indicates a first structure of one or more first XML elements, (b) one or more first values that correspond to said one or more first XML elements, and (c) a correlation between said one or more first values and said one or more first XML elements, **generating first data that conforms to said first structure**" as recited in Claim 2 and inherited by Claims 6, 8-11, 13, 19, 21-24, and 26.

The Office Action does not even allege that Lim discloses these features of Claims 6, 8-11, 13, 19, 21-24, and 26. Therefore, even if Fox and Lim could be combined, the combination still would not disclose, teach, or suggest the features of Claims 6, 8-11, 13, 19, 21-24, and 26 discussed above. For at least the above reasons, the Applicants respectfully submit that Claims 6, 8-11, 13, 19, 21-24, and 26 are patentable over Fox and Lim, considered either individually or in combination, under 35 U.S.C. § 103(a).

CLAIM REJECTIONS—35 U.S.C. § 102

Claims 1-5, 12, 14-18, and 27 were rejected under 35 U.S.C. §102(e) as being anticipated, allegedly, by Fox. The rejections are traversed for at least the reasons discussed below.

Claim 1 recites, among other features, "based on (a) a first XML schema that indicates a first structure of one or more first XML attributes, (b) one or more first values that correspond to said one or more first XML attributes, and (c) a correlation between said one or more first values and said one or more first XML attributes, **generating first data that conforms to said first structure**." The "first structure" to which Claim 1 refers is the structure that is indicated in the "first XML schema." The "first XML schema" of Claim 1 is like a "source XML schema," while the "second XML schema" of Claim 1 is like a "target XML schema." Thus, the recital, in Claim 1, of "generating first data that conforms to said first structure" refers to generating data that conforms to a source XML schema.

As is discussed above, although Fox discusses transforming (a) data that conforms to a source schema into (b) data that conforms to a target schema, Fox assumes that the data that conforms to the source schema already exists. Fox does **not** disclose **generating** the data that conforms to the source schema, let alone generating such data "based on (a) a first XML schema that indicates a first structure of one or more first XML attributes, (b) one or more first values that correspond to said one or more first XML attributes, and (c) a correlation between said one or more first values and said one or more first XML attributes" as recited in Claim 1.

Although Fox discusses inserting, into a target database table, data from a source database table that has different columns than the target database table does (as is discussed above in connection with Claim 29), Fox does **not** disclose **generating** the data that are in the source

database table at all. Although Fox discusses transforming (a) XML documents that conform to a source XML schema into (b) XML documents that conform to a target XML schema (as is discussed above in connection with Claim 29), Fox does **not** disclose **generating** the data that are in the former XML documents at all.

Therefore, Fox does not disclose, teach, or suggest "based on (a) a first XML schema that indicates a first structure of one or more first XML attributes, (b) one or more first values that correspond to said one or more first XML attributes, and (c) a correlation between said one or more first values and said one or more first XML attributes, **generating first data that conforms to said first structure**" as recited in Claim 1. For at least the above reasons, the Applicants respectfully submit that Claim 1 is patentable over Fox under 35 U.S.C. § 102(e). Claim 14, which depends from Claim 1, is patentable over Fox under 35 U.S.C. § 102(e) for similar reasons.

As is discussed above in connection with Claims 6, 8-11, 13, 19, 21-24, and 26, Fox does not disclose, teach, or suggest "based on (a) a first XML schema that indicates a first structure of one or more first XML elements, (b) one or more first values that correspond to said one or more first XML elements, and (c) a correlation between said one or more first values and said one or more first XML elements, **generating first data that conforms to said first structure**" as recited in Claim 2. For at least the above reasons, the Applicants respectfully submit that Claim 2 is patentable over Fox under 35 U.S.C. § 102(e). Claims 3-5, 12, and 15-18, which depend from Claim 2, are patentable over Fox under 35 U.S.C. § 102(e) for similar reasons.

As is discussed above, Claim 27 is patentable over Fox and Lim under 35 U.S.C. § 103(a). Therefore, Claim 27 is also patentable over Fox alone under 35 U.S.C. § 102(e).

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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